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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

15 ARIEL ABITTAN,

16
17 PLAINTIFF,

18 v.

19 LILY CHAO (A/K/A TIFFANY CHEN, A/K/A
20 YUTING CHEN), DAMIEN DING (A/K/A
21 DAMIEN LEUNG, A/K/A TAO DING),
22 TEMUJIN LABS INC. (A DELAWARE
23 CORPORATION), AND TEMUJIN LABS
24 INC. (A CAYMAN CORPORATION),

25 DEFENDANTS,

26 and

27 EIAN LABS INC.,

28 NOMINAL DEFENDANT.

Case No. 5:20-CV-09340-NC

**DECLARATION OF CONSTANTINE P.
ECONOMIDES IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
DEFENDANTS' MOTION TO DISMISS**

I, Constantine P. Economides, declare as follows:

1 1. I am an attorney licensed to practice law in the States of New York and Florida and
 2 admitted to practice before this Court *pro hac vice* to practice. I am counsel with the firm Roche
 3 Freedman LLP, and counsel for Plaintiff Ariel Abittan (“Plaintiff”). I make this declaration based
 4 upon my knowledge of the facts stated herein, and if called to testify, I could and would testify
 5 competently thereto. I submit this declaration in support of Plaintiff’s Opposition to Defendants’
 6 Motion to Dismiss.

7 2. Attached hereto as composite Exhibit A are true and correct copies of two
 8 “Affidavits of Due Diligence,” from a process server retained by Plaintiff’s previous counsel to
 9 serve process on Lily Chao.

10 3. Attached hereto as composite Exhibit B are true and correct copies of two
 11 “Affidavits of Due Diligence,” from a process server retained by Plaintiff’s previous counsel to
 12 serve process on Damien Ding.

13 4. Attached hereto as composite Exhibit C are true and correct copies of three
 14 updated “Proofs of Service,” from a process server retained by Plaintiff’s previous counsel to
 15 serve process on Lily Chao, Damien Ding, and Temujin Labs Inc.

16 5. Attached hereto as Exhibit D is a true and correct copy of an affidavit from a
 17 process server retained by Plaintiff’s previous counsel to serve process on Lily Chao, Damien
 18 Ding, and Temujin Labs Inc.

19 I declare under penalty of perjury that the foregoing is true and correct.

20 Executed this 18th day of June, 2021 at Miami, Florida.

21 Dated: June 18, 2021

ROCHE FREEDMAN LLP

/s/ Constantine P. Economides

Constantine P. Economides (*pro hac vice*)

Attorney for Plaintiff Ariel Abittan